

Barcomb, Alicia (USTP)

From: BlackStone LLC <texasblackstone@gmail.com>
Sent: Monday, January 8, 2024 4:34 PM
To: Sylvia Mayer; Barcomb, Alicia (USTP)
Cc: William Haddock; Ann Banda; shylanda sampson
Subject: [EXTERNAL] Re: FTR 1/8/24 Cause # 23-33848 Notice of "No Conform to Plan) Request a New Plan

Will try again to reach him. Please ensure that the court is informed of the non consent of the submission. There is misinformation that must be updated. Please Notify the court to make sure there are no notices sent out today January 8, 2024 with the incorrect plan.

I am including Ms. Barcomb on this email, I thought that she was added. thanks Its a tornado by us have to go

On Mon, Jan 8, 2024 at 2:16 PM Sylvia Mayer <smayer@smayerlaw.com> wrote:

You should be communicating with your attorney. Your attorney will advise you on next steps.

S. Mayer Law PLLC

Sylvia Mayer

Arbitrator | Mediator | Attorney

Work Phone: (713) 893-0339

Fax: (713) 661-3738

Mobile: (713) 703-3331

smayer@smayerlaw.com

www.smayerlaw.com

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From: BlackStone LLC <texasblackstone@gmail.com>
Sent: Monday, January 8, 2024 4:14 PM

To: Sylvia Mayer <smayer@smayerlaw.com>

Cc: William Haddock <WHaddock@pendergraftsimon.com>; Ann Banda <deeededell58@yahoo.com>; shylonda sampson <shywynsampsom@yahoo.com>

Subject: Re: FTR 1/8/24 Cause # 23-33848 Notice of "No Conform to Plan) Request a New Plan

Great. Do we all speak or do I speak to him and then he to you?

On Mon, Jan 8, 2024 at 12:34 PM Sylvia Mayer <smayer@smayerlaw.com> wrote:

Please communicate with your attorney. He can then call me to discuss.

S. Mayer Law PLLC

Sylvia Mayer

Arbitrator | Mediator | Attorney

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From: BlackStone LLC <texasblackstone@gmail.com>

Sent: Monday, January 8, 2024 2:13 PM

To: Sylvia Mayer <smayer@smayerlaw.com>

Cc: William Haddock <WHaddock@pendergraftsimon.com>; Ann Banda <deeededell58@yahoo.com>; shylonda sampson <shywynsampsom@yahoo.com>

Subject: Re: FTR 1/8/24 Cause # 23-33848 Notice of "No Conform to Plan) Request a New Plan

Hello there all , I have been trying to call...are you available today or sometime later this week? Thanks

1

On Mon, Jan 8, 2024 at 7:04 AM Sylvia Mayer <smayer@smayerlaw.com> wrote:

Please communicate with me through your attorney. I have sent your attorney my questions and comments to the Plan on file and await his response.

S. Mayer Law PLLC

Sylvia Mayer

Arbitrator | Mediator | Attorney

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From: BlackStone LLC <texasblackstone@gmail.com>

Sent: Monday, January 8, 2024 8:15 AM

To: William Haddock <WHaddock@pendergraftsimon.com>; Ann Banda <deedeedell58@yahoo.com>; BlackStone LLC <texasblackstone@gmail.com>; shylynda sampson <shywynsampsom@yahoo.com>; Sylvia Mayer <smayer@smayerlaw.com>

Subject: FTR 1/8/24 Cause # 23-33848 Notice of "No Conform to Plan) Request a New Plan

The debtor, Blackstone Investment Group, does not confirm the plan of SBA under Chapter 11 Title 5 that was submitted on January 2, 2024 . Debtor is requesting notification of the court for modification .

Blackstone Investment Group LLC
5233 Bellaire BLVD #445
Bellaire, TX 77401
Ann Banda , Managing Member
Texasblackstone@gmail.com

January 6, 2024

Willaim P. Haddock
Pendegraft & Simon
2777 Allen Parkway #800
Houston, Texas 770019
WHaddock@pendergraftsimon.com

Sylvia Mayer,
Subchapter V Trustee
S. MAYER LAW PLLC S.D.
Tex. I.D. No. 16889
SBA No. 00787028
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Alicia L. Barcomb
Counsel for the U.S. Trustee
TX State Bar No. 24106276
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RE; For the Record Debtors Official Notification Plan Not Confirmed -Debtor Does Not Consent-Debtor Request to Amend Plan

Amendment and Update of Schedules and Financial Documentation in Blackstone Investment Group's Bankruptcy Proceedings:

To ensure compliance and accuracy in Blackstone Investment Group's ongoing Chapter 11 bankruptcy proceedings, it is crucial to amend and update all relevant schedules, financial statements, and documentation. This process includes incorporating recent contracts, legal cases, and financial updates, thereby reflecting the current status of the debtor's affairs.

Amendment and Update Remove James Alm for Schedules and Financial Documentation in Blackstone Investment Group's Bankruptcy Proceedings:

This is an error , James Alm alleged transfer of property to Bellum Civile.

Amendment and Update Remove Klien Taxes

Correcting any inaccuracies regarding property tax liabilities

Bankruptcy History

Bankruptcy Filed under Chapter 7, individual on June 5, 2023 Brendon Singh, was counsel to the case and was assigned case number 23-33848 to Chief Judge Eduardo Rodriguez . The case was dismissed , as there were complications in processes which Debtor learned that

would benefit the debtor , "a party of interest" as well As the debtor's creditors.

that Bankruptcy filed under Small Business Bankruptcy Chapter 11 Subchapter 5 on October 2, 2023 case was assigned case number 23-33848 to Judge Marvin Isgur and then reassigned to Chief Judge Eduardo Rodriguez.

No Confirm of Plan - Request for Submission of a New Plan

The debtor, Blackstone Investment Group, does not confirm the plan of SBA under chapter 11 Title 5 that was submitted on January 2, 2024 . Debtor is requesting notification of the court of modification .

Debtors initial submissions as the Part A of Pan was submitted in November 2023 , and Amended Part A was submitted in December 20, 2023 w/ Balance Sheets .

Debtor was awaiting response of approval/disapproval and guidance of Trustee and Counsel since November 2023 and was not involved in the January 2, 2024 submission of the “Plan of Reorganization for Small Business Chapter 11” and the Debtor’s Consensual Plan“ absent Trustee . Debtors' disagreement with the proposed reorganization plan highlights significant concerns regarding fairness, transparency, legal compliance, and legally compliant restructuring process. The Trustee’s proactive involvement in rectifying the plan, addressing conflicts, and conducting thorough audits is imperative in safeguarding the interests of all parties and facilitating a just resolution to the bankruptcy case. The plan that was submitted was formulated without the active involvement of the debtor and in the absence of requested collaboration with the Trustee, rendering it unfulfilled to Debtor's interest and other creditors under Chapter 11/ 5 of the Bankruptcy Code and Consensual Plan.

The Debtor does not confirm the accuracy of information and requests modifications . The Debtor believed that there were inaccuracies in the January 2, 2024 submission of the “Plan of Reorganization for Small Business Chapter 11” apart from the Debtors Proposed “Financial Organizational Plan-(Minority Family Owned Small Business)” plans and does not seem to employ all provisions and benefits in all interest of recovery off all debts of the estate and Trustee. The Plan submitted did not involve accurate information it is our belief that it was last updated on October 2023 . This will need to be amended. There is misinformation that needs to be updated.

Attendance at a meeting of creditors pursuant to 11 U.S.C. § 341(a).

Debtor identified pre/post petition claims of fraud . The Trustee should work to ensure that any claims of pre and post-petition fraud are properly documented in the reorganization plan and that appropriate legal actions, Rule 9011 including federal investigations, are initiated where necessary.

Need to work with Counsel of Trustee and Notify the Court

Under 11 U.S.C. § 327, the Bankruptcy Code mandates that attorneys involved in bankruptcy cases must be disinterested and not hold or represent any interests adverse to the estate they are representing. The presence of a “live” conflict, as alleged in this case, directly contravenes this requirement and raises concerns about the integrity of the legal representation provided. Trustee Investigation

The Trustee has an obligation to Report Fraud to the Court and Investigating Alleged criminal, fraudulent, or abusive conduct for possible civil or criminal prosecution.

Adverse claim against Debtor and securities intermediary (s) as the Debtor has a property interest in a financial asset and that it is a violation of the rights of the claimant for another person to hold, transfer, or deal with the financial asset. A genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” claim to recover its alleged overpayment “the correct [payoff] amount” as relating to alleged violation of 523(a)(4): debts arising from fraud or defalcation while acting in a fiduciary capacity, embezzlement, or larceny. Note: The error of records must be corrected to reflect the principal loan amount, exclude fraudulently withheld and segregated funds, and account for overpayments and interest. Failure to credit payments according to regulations, such as 12 CFR 1026.36(c)(1), is alleged, resulting in misappropriation of funds.

Right to Financial Statement At the heart of these challenges is the fundamental right of a business to produce and rely upon accurate financial reports. This right is essential for the integrity of business operations and for the trust of all stakeholders, including investors, creditors, and employees. The reorganization process will focus on restoring this fundamental right, ensuring that going forward, Blackstone has access to reliable and precise financial information for its decision-making processes. The Debtor has an undisputed title and the Debtor has a Right to demand disclosure in connection, and negotiations with subsequent creditors and purchasers for the purpose of establishing his credit standing and proving which of his assets are free of the security interest. The plan must address and resolve the issues stemming from deprivation of financial statements and the proper accounting of financial assets involving constraints of past financial misappropriations and misrepresentations.

Bar Claim- Abuse of Process in Cases 202267980, 202307511, and 1188903-Multiple Investment Proceedings, Same Party(s) , Claims(s) and harm(s) . This allegation pertains specifically to the following cases: District Case 202267980, District Case 202307511, and County Case 1188903 In our view, this practice extends the doctrine of abuse of process beyond its traditional boundaries in the realm of corporate restructuring. In these cases, it seems that claims for identical economic harm are being prosecuted in multiple forums that provide similar substantive due process and procedural protections, thereby undermining the integrity and efficiency of the dispute resolution process. This pattern of litigation not only places an undue burden on the parties and the courts but also threatens the legitimacy of the Investor-State Dispute Settlement system as a whole.

Alleged Violation of (Role SEC-registered investment adviser/ administrative agent on behalf of the loan syndicate Title Company Custody Rule)

TransAct ID 45-3483105 d/b/a Salima T. Umatiya d/b/a Umatiya Law Firm d.b/a TransAct Title, LLC, Mansoor Chaudhry , Amanda Kimbrough

Patriot ID 81-0749101 d/b/a Genevine B Estrade d/b/a Estrada & Edwards Group LLC , Secured Title d/b/a Sylvester Williams d/b/a Sylvester Williams & Associates, the debtor has alleged

substantial loss due to breach of fiduciary, duty and defalcation., failure to recuse to non interest holding, misappropriation of trust and property Obligations between the title company and the debtor, particularly in relation to Bellum Civile property acquired.

Status of any litigation pending in or outside this Court-OPEN

Allegations of fraud against Bellum involving the above mentioned open proceedings in state and district court necessitate a thorough investigation by the Trustee. These allegations, if proven, could have a significant impact on the credibility and legality of the claims made by Bellum in the bankruptcy case. The Trustee must ensure that any fraudulent activities are accounted for in the reorganization plan and that such activities do not unduly influence the plan's structure or the distribution of assets.

Case: 1188903, Bellum Civile, LLC vs Black Stone Investment Group, County Civil Court Law Court 1 -Honorable Audrie Lawson Evans (Submission of Bankruptcy Filing/Previous Counsel Email)

Case: 202267980 , Bellum Civile, LLC vs Black Stone Investment Group, Court District Court Law Court 281 -Honorable Christine Weems (Submission of Bankruptcy Filing/Previous Counsel Email)

Case: 202307511 Black Stone Investment Group vs Bellum Civile, LLC vsCourt District Court Law Court 55th -Honorable Latosha Lewis Payne (Submission of Bankruptcy Filing)

Cause 202340826 Black Stone vs.Bellum Civile in District Court Law Court 55th -Honorable Court 080 Honorable Jeralynn Manor (Submission of Bankruptcy Filing)

Right to challenge the secured status of a creditor.Bellum Civile, LLC.

Debtors have the right to challenge the secured status of a creditor, particularly if there are issues related to the nature of the underlying debt and alleged the existence and legitimacy of the security interest. In active litigation there is an absence of discovery as well as abstract or Judgment lien for Creditor Bellum Civile LLC. This claim should not be secured until verified no bias in classification of distribution . Debtor has notated appears to be "charging" the default rate of interest from the date of maturity of the Note , without regard to payments made on the Note since that time. Demand was made for immediate breakdown and accounting of the amounts .Alleged deliberate withholding/ manipulation of financial records and statements impedes the borrower's ability to keep track of their debts, payments, and overall financial health. This cloud of uncertainty can lead to wrongful penalties, excessive interest charges, and unwarranted debt accumulation. failed to respond to the borrower's demand for a complete accounting, it takes the position that no payments have been made as the payoff amounts previously demanded. There is a Year to date receipt of \$189,000. Debtor demanded an accounting of the payoff amount on all Notes, breaking down principal, interest (non-default and default), and expenses added to the balance due pursuant to the Notes and the security instruments, taking into account all payments made by the Maker of the Notes and escrow amounts held by the prior noteholders in connection with the Notes. (From June 2022-Present)

Please also see attached Trustee Assistance to be also included in Blackstone Investment Group's Reorganization Plan; would like to include the Trustee Counsel in this Facilitation as these are some extremely complex webs.

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